

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In Re: BOY SCOUTS OF AMERICA AND DELAWARE BSA, LLC, ¹ Debtors.	Chapter 11 Case No. 20-10343 (LSS) (Jointly Administered)
OFFICIAL TORT CLAIMANTS' COMMITTEE OF BOY SCOUTS OF AMERICA and DELAWARE BSA, LLC, Plaintiffs, -against- BOY SCOUTS OF AMERICA and DELAWARE BSA, LLC, Defendants.	Adv. Pro. No. 21-50032 (LSS) Related Docket No.: 15

**CERTIFICATION OF COUNSEL REGARDING MOTION TO
INTERVENE OF JPMORGAN CHASE BANK, NATIONAL ASSOCIATION**

The undersigned counsel to JPMorgan Chase Bank, National Association (“JPM”) hereby certifies as follows:

1. On April 23, 2021, JPM filed its Motion to Intervene [Adv. Docket No. 15] (the “Motion”) in the above-captioned adversary proceeding. Pursuant to DEL. BANKR. L.R. 7007-1(a), objections or responses to the Motion were due on or before May 7, 2021.

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors’ mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

2. Prior to the response deadline, counsel to JPM received informal comments from counsel to plaintiff, the Official Tort Claimants' Committee of Boy Scouts of America and Delaware BSA, LLC ("Plaintiff"), with respect to the Motion.

3. In response to the informal comments from Plaintiff, JPM has prepared a revised proposed order granting the Motion, which is attached hereto as **Exhibit A** (the "Revised Proposed Order"). Attached hereto as **Exhibit B** is a redline reflecting the changes between the proposed order filed with the Motion and the Revised Proposed Order.

4. Except as set forth herein, the undersigned has received no answer, objection, or other response to the Motion. The Court's docket in these cases reflects that no answer, objection, or other response to the Motion has been filed.

WHEREFORE, the undersigned respectfully requests that the Revised Proposed Order attached hereto as **Exhibit A** be entered by the Court without further notice or hearing.

Dated: May 14, 2021
Wilmington, Delaware

WOMBLE BOND DICKINSON (US) LLP

/s/ Morgan L. Patterson

Matthew P. Ward (DE Bar No. 4471)
Morgan L. Patterson (DE Bar No. 5388)
1313 North Market Street, Suite 1200
Wilmington, Delaware 19801
Telephone: (302) 252-4320
Facsimile: (302) 252-4330
Email: matthew.ward@wbd-us.com
morgan.patterson@wbd-us.com

-and-

NORTON ROSE FULBRIGHT US LLP

Louis R. Strubeck, Jr. (admitted *pro hac vice*)
Kristian W. Gluck (admitted *pro hac vice*)
Ryan E. Manns (admitted *pro hac vice*)
Laura Smith (admitted *pro hac vice*)
2200 Ross Avenue, Suite 3600
Dallas, Texas 75201
Telephone: (214) 855-8000
Facsimile: (214) 855-8200
Email: louis.strubeck@nortonrosefulbright.com
kristian.gluck@nortonrosefulbright.com
ryan.manns@nortonrosefulbright.com
laura.smith@nortonrosefulbright.com

*Counsel to JPMorgan Chase Bank, National
Association*